Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Policies and Rules Implementing	)	CC Docket No. 93-22
the Telephone Disclosure and Dispute	)	RM-7990
Resolution Act	)	

COMMENTS

BellSouth Telecommunications, Inc. ("BellSouth") files these comments in response to the Commission's Notice of Proposed Rule Making and Notice of Inquiry in the above-captioned proceeding.[1] To discharge its responsibilities under Title I of the Telephone Disclosure and Dispute Resolution Act (TDDRA),[2] the Commission has proposed regulations governing common carrier provision of pay-per-call services in the interstate jurisdiction. These regulations will impact BellSouth both as provider of exchange access service and as billing and collection agent for numerous interexchange carriers (IXCs).

BellSouth is participating in the development of pay-per-call regulations through a related proceeding by the Federal Trade Commission (FTC). Many of the issues raised in the FTC proceeding are also under investigation in this rulemaking, and the views expressed by BellSouth in comments

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[1] In the Matter of Policies and Rules Implementing the Telephone Disclosure and Dispute Resolution Act, CC Docket No. 93-22, RM-7990, FCC 93-87, Notice of Proposed Rule Making and Notice of Inquiry, released March 10, 1993 (hereinafter "FCC NPRM").

[2] Telephone Disclosure Act of 1992, Pub.L.No. 102-556, 1992 U.S.C.C.A.N. (106 Stat.) 4181.

to the FTC are likewise germane to the current docket. Accordingly, BellSouth's filing with the FTC is appended to these comments as Attachment 1. BellSouth asks that Attachment 1 be incorporated in the record of the FCC rulemaking. Further, BellSouth offers the following comments addressed to regulations now under consideration in the current rulemaking.

DISCUSSION

Section 64.1502 Limitations on the Provision of Pay-Per-Call Services.

BellSouth interprets this regulation as imposing compliance responsibility on the IXC, which assigns pay-per-call numbers and maintains a business relationship with the information provider (IP). BellSouth asks the Commission to clarify that local exchange carriers (LECs) such as BellSouth are not required to insure IP compliance with these and other implementing regulations of the TDDRA and may assume compliance absent actual notice to the contrary. This result comports with the absence of LEC knowledge as to the identity of the IP and the inability of LECs to monitor compliance with preamble requirements, pricing disclosures and other features of the programming offered to consumers.

Section 64.1504 Restrictions on the Use of 800 Numbers.

BellSouth opposes use of the 800 service code as a means of accessing pay-per-call services. Such an application confuses consumers, increases service complaints and attendant processing costs and hinders administration of pay-per-call provisioning rules. BellSouth does, however, support the proposed exemption for transactions involving a preeexisting agreement to be charged for information or the use of a credit or charge card. BellSouth further supports extension of the "charge card" definition to include carrier-issued calling cards.

Section 64.1506 Number Designation.

BellSouth supports the proposal to limit provisioning of interstate pay-per-call services to the 900 service predicated upon the failure to pay charges associated with pay-per-call services. BellSouth is nevertheless concerned about the language of proposed sections 64.1505 and 64.1507, which appear to contemplate the continued offering of interstate programming services on a collect call basis. BellSouth has no present ability to differentiate collect pay-per-call services from other collect calls. Such notification would have to be provided by the IXC/IP in order to extend the protection of this rule to programming offered on a collect call basis.

Alternatively, BellSouth recommends that Commission rules prohibit the offering of interstate pay-per-call services through collect call dialing. This measure would offer consumers some protection from unwanted programming and eliminate needless public confusion.

Section 64.1508 Blocking Access to 900 Service.

BellSouth currently offers pay-per-call service blocking at the area code (e.g., 900) level. BellSouth has limited switching system software to accomplish blocking targeted to certain prefixes or specific pay-per-call programming. Further, as BellSouth has previously observed, there are "inherent limitations in the number of network screening capabilities obtainable from an individual switch. To the extent screening translations are depleted to provide these variations of 900 service blocking, BellSouth's ability to offer other service options having potentially wider appeal could be adversely affected."[4]

BellSouth is also constrained to oppose 900 service presubscription, which requires the customer's affirmative election to receive pay-per-call programming. This proposal closely resembles a state-imposed automatic default blocking requirement recently struck down by the Commission.[5] The effect in both cases is to create unnecessary impediments to the provisioning of pay-per-call services.[6] Further, a system of presubscription would require a significant outlay of employee hours to implement and would greatly add to BellSouth's pay-per-call compliance costs.[7] By contrast,

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[4] In the Matter of Policies and Rules Concerning Interstate 900 Telecommunications Services, CC Docket No. 91-65, Reply, May 24, 1991, pp. 1-2.

[5] In the Matter of Petition for an Expedited Declaratory Ruling Filed by National Association for Information Services, Audio Communications, Inc., and Ryder Communications, Inc., FCC 93-45, Memorandum Opinion and Order, released January 22, 1993.

[6] "[A]utomatic default blocking would strike a very different balance between the goals of encouraging interstate 900 services and facilitating consumer control over their family's exposure to 900 services. It promotes the latter goal by establishing that, absent a specific election by the consumer, there will be no access to interstate 900 services. As such it gives no weight to the goal of making interstate communications services generally available." Id. at para. 18 (emphasis in original).

[7] For example, to implement the system of reverse blocking prescribed by the South Carolina PSC would require the development of procedures and manual operations necessary to block one million, one hundred thousand (1,100,000) subscriber lines terminating in 123 central offices. It is estimated that 4800 employee hours would be required to complete this work. Further, certain switch types used by BellSouth may not possess technical parameters

the alternative of customer-initiated blocking (as proposed in Section 64.1508), which is readily obtainable from BellSouth and other LECs, represents a more balanced compromise between the goals of individual subscriber control over service and general availability of pay-per-call programming.

BellSouth does not favor the inclusion of pay-per-call blocking requirements in LEC interstate access tariffs. In BellSouth's view, blocking is associated with subscriber lines obtained under state tariffs and accordingly should be tariffed in the state jurisdiction. Moreover, to the extent state and federal tariffs are not identical, variations will predictably cause confusion and encourage tariff shopping.

Section 64.1509 Disclosure and Dissemination of Pay-Per-Call Information.

In order to disseminate information to the public, BellSouth suggests that the following statement accompany itemization of pay-per-call charges on every bill page where these appear:

> NON-PAYMENT OF PAY-PER-CALL CHARGES WILL NOT RESULT IN DISCONNECTION OF YOUR LOCAL SERVICE. YOU CAN OBTAIN BLOCKING OF PAY-PER-CALL SERVICE FROM BELLSOUTH. IF YOU HAVE QUESTIONS ABOUT YOUR CHARGES CALL ____________________.

Additionally, BellSouth proposes to include in the Customer Guide section of the White Pages directory an explanation of BellSouth's role in provisioning pay-per-call service, a statement of policy regarding nonpayment, notification of the availability of blocking, a statement of carrier and customer rights/obligations and instructions on obtaining futher information related to pay-per-call billing. BellSouth will also include this information annually in bill inserts and supplement as necessary with disclosure of any recent developments in the industry.

Section 64.1510 Billing and Collection of Pay-Per-Call Charges.

This rule would require the billing agent to furnish call detail (e.g., time of day, call duration) with every pay-per-call charge billed to a customer. Such information is not available to BellSouth unless provided by the IXC. Thus, if the proposed requirement is adopted, the Commission should further require IXCs to make call detail available to billing agents and to implement reasonable measures to insure the accuracy of data provided. Likewise, it would be incumbent on IXCs to provide any required identifying information pertaining to IPs, with whom BellSouth has no contractual relationship, and to insure the currency of the data submitted.

Section 64.1511 Forgiveness of Charges and Refunds.

BellSouth has adopted a liberal policy to govern adjustments of pay-per-call charges and will effect an adjustment upon receipt of a customer complaint or notification by the IXC. As discussed elsewhere in these comments, BellSouth is generally dependent upon end users and/or IXCs to provide notice of objectionable IP business practices. BellSouth will investigate any alleged violation of law or regulation brought to its attention. In appropriate circumstances, a system edit can be imposed to screen and eliminate billing for any pay-per-call number where violations have been detected.

In accordance with longstanding business custom, BellSouth prefers to conduct billing inquiries through telephone contact with customers and likewise accepts customer complaints through the same medium.

Section 64.1512 Involuntary Blocking of Pay-Per-Call Services.

BellSouth strongly supports the allowance of involuntary blocking of pay-per-call services as proposed in this regulation. To date, BellSouth has obtained authority for involuntary blocking in seven of nine state jurisdictions. Such blocking may be imposed following the second adjustment of pay-per-call charges within a twelve month period for other than good cause (e.g., refusal to pay, denial of knowledge related to charges, default on payment arrangements).

Section 64.1515 Recovery of Costs.

BellSouth favors an incremental standard to develop costs associated with pay-per-call compliance. Costs related to the billing function can be identified and generally consist of the following: computer programming, computer processing, collection efforts, postage, paper, and customer contact costs. These costs may vary between state jurisdictions due to variations in billing procedure and format required by state regulatory authority.

BellSouth has employed long-run incremental cost methodology to develop costs associated with the offer of Customized Code Restriction (CCR), used to provide 900 and other code blocking options. Both recurring and nonrecurring costs are generated through the offer of CCR. Recurring costs associated with CCR investments include depreciation, cost of money, income taxes, maintenance, administration, ad valorem and gross receipts taxes. In determining nonrecurring costs, BellSouth develops estimated worktimes for service activation and deactivation. These worktimes are multiplied by labor rates for each work group performing a CCR-related function. The product of these computations, when adjusted to include inflation and gross receipts taxes, constitutes the total nonrecurring cost identified for CCR provisioning.

BellSouth proposes to recover pay-per-call compliance costs through the use of billing and collections (B&C) charges imposed on IXCs and other B&C customers. Presumably some or all of their compliance costs will be passed on to IPs through contractual or tariff provisions.

CONCLUSION

BellSouth asks that the Commission adopt rules applicable to the provisioning and billing of interstate pay-per-call services which are consistent with the views expressed in the foregoing comments and in Attachment 1 to this filing.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: Helen A. Shockey
William B. Barfield
Richard M. Sbaratta
Helen A. Shockey

Its Attorneys

1155 Peachtree Street, N.E.
Suite 1800
Atlanta, Georgia 30367-6000

April 19, 1993

ATTACHMENT 1

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Before the
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

FILE COPY

In the Matter of	)	
	)	
PROPOSED TELEPHONE DISCLOSURE RULE	)	FTC File No. R311001
	)	

COMMENTS

BellSouth Telecommunications, Inc. ("BellSouth") hereby submits these comments in response to the Commission's Notice of Proposed Rulemaking in the above-referenced proceeding (hereinafter "NPRM").[1] In accordance with requirements of the Telephone Disclosure and Dispute Resolution Act of 1992 (TDDRA),[2] the Commission has proposed certain regulations to govern the provisioning and billing of pay-per-call services.[3]

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[1] Trade Regulation Rule Pursuant to the Telephone Disclosure and Dispute Resolution Act of 1992, 58 Fed. Reg. 13370 (1993) (to be codified at 16 C.F.R. pt. 308).

[2] Telephone Disclosure Act of 1992, Pub.L.No. 102-556, 1992 U.S.C.C.A.N. (106 Stat.) 4181.

[3] Pay-per-call services, defined in Section 228 of the Communications Act, 47 U.S.C. Section 228, consist of various information and entertainment services offered over telecommunications transmission facilities. Charges for such services are generally assessed as a flat rate per call or as a usage sensitive rate based upon call duration. In either event, these charges are in addition to (and often substantially greater than) the charges attributable to call transmission. Pay-per-call services expressly exclude directory services provided by common carriers or their affiliates, tariffed services and services requiring a presubscription or similar arrangement with the service provider. In addition, the Act addresses itself solely to interstate services, thus excluding LEC-provided offerings like 976, N11, etc. As hereinafter used in these comments, the term "pay-per-call" refers only to interstate services, which (at least for the present) are predominantly accessed

These regulations are intended to eliminate customer confusion and curb abuses in the industry related to the assessment of pay-per-call charges.

BellSouth supports the legislation enacted for pay-per-call services and most specifics of the proposed implementing regulations. In the past, BellSouth has worked cooperatively with interexchange carriers (IXCs) and information providers (IPs) to promote the delivery of quality pay-per-call services to consumers and eliminate deceptive and unethical practices within the industry. In addition, BellSouth has participated in regulatory proceedings at both the federal and state level to address concerns related to the provisioning of these services.

BellSouth is a communications common carrier providing exchange and exchange access services in a nine-state area.[4] In the context of pay-per-call services, BellSouth provides the access link connecting end users (some of whom may be pay-per-call IPs) to IXC networks. BellSouth has also entered into contractual arrangements with numerous IXCs to

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using the 900-NXX dialing sequence.

[4] States served by BellSouth are Florida, Georgia, North Carolina, South Carolina, Alabama, Kentucky, Louisiana, Mississippi, and Tennessee. In addition to BellSouth, independent local exchange companies (LECs) also provide service to their certificated areas within these jurisdictions.

provide the latter witn billing and collection services.[5] Pursuant to these contracts BellSouth will bill and collect from end user customers charges incurred for IXC services and charges incurred for pay-per-call programming.

The following comments are addressed to proposed regulations governing access standards and billing requirements and thus reflect BellSouth's dual role in the provision of pay-per-call services.

DISCUSSION

I. Section 308.5 Pay-Per-Call Service Standards

While largely devoted to preamble requirements, proposed Section 308.5 also prohibits pay-per-call service providers from billing any amounts in excess of charges disclosed in the preamble and from billing for any noncompliant pay-per-call service. The Commission notes that an analogous requirement is imposed on common carriers under Title I of the TDDRA. This section further prohibits use of an 800 telephone number (or any other number widely understood to be toll free) in provisioning pay-per-call services. Subsection (i) prescribes certain format

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[5] In 1986, the Federal Communications Commission detariffed LEC provision of interstate billing and collection services to third parties. Detariffing of Billing and Collection Services, CC Docket No. 85-88, 102 F.C.C.2d 1150 (1986); recon. denied, 1 FCC Rcd 445 (1986).

requirements applicable to pay-per-call billing statements.[6]

BellSouth concurs with the prohibition on billing for noncompliant services and agrees that any billing entity should suspend collection efforts on reasonable notice of a TDDRA violation. Nevertheless, both this Commission and the FCC, which share enforcement responsibility, must remain mindful of the limitations facing LECs such as BellSouth in the detection and remedy of violations in the pay-per-call service industry. The billing and collection services of BellSouth are performed for IXCs. BellSouth has no business or contractual relationship with pay-per-call IPs; indeed, the identity of an IP is generally unknown. Given these circumstances, there is little likelihood that BellSouth could detect violations (absent end user complaints) or take corrective action with IPs.[7] By contrast, the IXCs do maintain a contractual relationship with IPs and are thus in a more favorable position to monitor pay-per-call programming and insure compliance with regulatory requirements.

BellSouth supports the proposed ban on provisioning

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[6] Format requirements are also addressed in the FCC's Notice of Proposed Rulemaking at section 64.1510. Policies and Rules Implementing the Telephone Disclosure and Dispute Resolution Act, CC Docket No. 93-22, RM-7990, Notice of Proposed Rule Making and Notice of Inquiry, released March 10, 1993 (hereinafter "FCC NPRM").

[7] To illustrate, because BellSouth does not rate 900 calls, it would generally have no knowledge respecting the rate charged for a call or whether such rate exceeded charges disclosed in the preamble.

pay-per-call services using the 800 prefix or other dial sequence generally associated with toll free calling.[8] Limiting pay-per-call to a single, widely recognized means of access (e.g., 900) will mitigate existing public confusion and reduce the incidence of customer complaints and adjusted billing.[9] BellSouth understands that this prohibition would extend to any use of an 800 number or other traditionally toll free prefix that would result in the calling party being:

* assessed a charge for the call by virtue of completing the call;
* connected to a pay-per-call service;
* charged for information conveyed during the call (unless the calling party has a pre-existing agreement to be charged for the information or discloses a credit or charge card number and authorizes a charge to that card number during the call); or
* called back collect.[10]

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[8] 16 C.F.R. Section 308.5(h) (proposed). This issue is also addressed at Section 64.1504 of the FCC NPRM.

[9] In response to the Commission's inquiry (58 Fed. Reg. at 13383), BellSouth states that it currently adjusts approximately 1/3 of all billed 900 calls. These adjustments are necessitated by a myriad of reasons, e.g., billing error, inability or unwillingness to pay, unauthorized use, etc. A detail of billing adjustments effected for the month of February 1993 is attached as Exhibit 1 to this filing.

[10] BellSouth further understands that the proposed restriction would not preclude billing for traditional toll calls--whether intrastate, interstate, or international--where an 800 Service is the destination or an 800 Service is used for call completion. Such calls are exemplified by the following:

With respect to the formatting requirements of Section 308.5(i), BellSouth supports the separate identification of pay-per-call charges on customer bills.[11] BellSouth does not favor segregating pay-per-call charges on a separate page, which would increase bill length (already deemed excessive by some customers) and increase BellSouth's costs of bill production.

To highlight pay-per-call charges BellSouth suggests that these charges be separately identified on both LEC and IXC bill pages and preceded by a statement similar to the following:

> NON-PAYMENT OF PAY-PER-CALL CHARGES WILL NOT RESULT IN DISCONNECTION OF YOUR LOCAL SERVICE. YOU CAN OBTAIN BLOCKING OF PAY-PER-CALL SERVICE FROM BELLSOUTH. IF YOU HAVE QUESTIONS ABOUT YOUR CHARGES CALL ____________________.

This brief notice provides a local or toll-free number for questions, enabling customers to obtain information regarding complaint and adjustment procedures from a service representative. In addition, the notice informs customers that blocking is available from the LEC and that local

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* The toll charge is for accessing an 800 Service from a point outside of the USA.
* The toll charge is for accessing an 800 Service from a point on the high seas.
* The toll charge is for a call to the USA made by accessing a carrier operator via an 800 Service number.

[11] See also FCC NPRM, Section 64.1510(b).

service may not be disconnected for failure to pay pay-per-call charges.

The Commission should reject any proposal to include IP data on LEC bills.[12] The number of IPs and the frequency of name/location/telephone number changes would preclude maintenance of a current database. In lieu of this approach, BellSouth favors the use of existing methods for disseminating information to the public, which are of proven reliability and universally accessible.

One such vehicle is the Customer Guide section of the White Pages directory. BellSouth proposes to include in this section a description of pay-per-call service and an explanation of BellSouth's role in provisioning the service. The Guide would also set out BellSouth's policy regarding nonpayment (i.e., no denial of local service for nonpayment), instructions for obtaining further information from IXC billing statements, and notification regarding the availability of blocking. The above information would be replicated in bill inserts on an annual basis and supplemented as needed by disclosure of any recent developments in the industry. This method has been successfully employed by BellSouth with reference to the intrastate offering of 976 service and can be readily adapted to satisfy the needs of pay-per-call service users.

The Commission also seeks comment on a proposal to

[12] 58 Fed. Reg. at 13382.

require access codes or PIN numbers as a prerequisite to obtaining pay-per-call services. While these features have been available for many years in specialized network applications (e.g., Centrex services), it is not feasible to provide access codes or PINs in conjunction with Plain Old Telephone Service (POTS). This is because significant switch memory would be required to provision every end user station with access code or PIN capability. Such an application would not constitute an efficient use of network resources and conceivably could compromise BellSouth's ability to offer services of more universal appeal.[13]

Apart from considerations of network efficiency, customers already possess an effective means of curtailing unauthorized use. Pursuant to FCC directive,[14] all LECs now offer free, one-time blocking of pay-per-call services to residential customers. Subsequent residential blocking and blocking of business service are likewise available for a modest, one-time fee.[15]

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[13] BellSouth understands that access codes or PIN numbers may be incorporated in the service offered by an IP [illegible]

BellSouth supports the proposal to require call detail records as the basis for all pay-per-call service billing. This requirement prevents the alteration of records to reflect collect calls or 800 charges, which BellSouth as billing agent cannot identify as pay-per-call. BellSouth notes that the IXC is the carrier in possession of call detail records and asks the Commission to charge that entity with responsibility for assuring record correctness.

II. Section 308.7 Billing and Collection for Pay-Per-Call Services

In addressing the requirements proposed by this section the Commission has requested comment on extending customer responsibility to include calls made by other household members or calls placed by other persons using the customer's telephone.[16] It is BellSouth's position that each telephone subscriber exercises ultimate control over the use of his/her service. Thus, a customer should not be permitted to avoid financial responsibility for telecommunications charges properly assessed to his/her account merely because the charges were incurred by another household member or other person using the customer's telephone. As a general matter, BellSouth sees no justification for excepting pay-per-call charges from the application of this principle.

While a claim of unauthorized use may constitute

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[16] 58 Fed. Reg. at 13383-13384.

sufficient grounds for removing telecommunications charges from a customer bill, each case must be evaluated on its own merits. In particular, BellSouth looks to the customer's notice (or lack thereof) of the probability of unauthorized use, whether such claims are repetitive in nature and whether the customer has taken reasonable preventative action. BellSouth submits that this is the correct approach when considering customer responsibility for pay-per-call charges.

With respect to dispute resolution procedures outlined in Sections 308.7(b) and (c), BellSouth has long accepted oral notification to initiate a bill review and currently follows this practice with respect to pay-per-call services.[17] The customer is advised to deduct any disputed charge from payments made during pendency of the bill investigation, notwithstanding that the disputed charge will continue to appear as a balance owed. If the investigation reveals a billing error, the disputed charge is removed and an adjustment is recorded in the next billing statement. If no adjustment is warranted, the customer becomes liable for payment of the disputed charges with the next billing cycle. In appropriate cases, BellSouth will negotiate other payment

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[17] Most billing inquiries are oral. In the case of a writing, BellSouth will attempt to contact the customer by telephone. A letter will be sent following several unsuccessful attempts to reach the customer by telephone. Correspondence received by BellSouth and related to the account of a carrier for whom BellSouth does not perform inquiry services is forwarded to that IXC.

arrangements with a customer, including installment payments and extensions of time to remit payment.[18]

BellSouth opposes a requirement that customers be accorded a minimum of 20 days to pay pay-per-call service charges which have been validated by investigation.[19] This provision would require a different procedure for pay-per-call charges as compared with all other telecommunications charges and would be confusing to customers and costly to implement. The present procedures are adequate to protect consumers and remain subject to regulatory oversight.[20] Likewise, BellSouth does not favor a proposal to provide written acknowledgment of a customer's claim of billing error.[21] This requirement if implemented would impose additional mailing costs on BellSouth (approximately $6.75 per mechanized letter without service representative intervention), increase complaint processing time and necessitate further expenditures for file management of supporting documentation.

Subsection 308.7(m) generally prohibits retaliation

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[18] A more detailed description of BellSouth's billing inquiry procedures is contained at Exhibit 2 to this filing.

[19] 16 C.F.R. Section 308.7(d)(3) (proposed).

[20] Intrastate billing and collection services are still provided under tariff. The FCC, which has detariffed corresponding interstate services, continues to assert Title I jurisdiction under the Communications Act to address any unreasonable practices which might be introduced.

[21] 16 C.F.R. Section 308.7(d)(1) (proposed).

against a customer who in good faith disputes the imposition of pay-per-call charges. While BellSouth concurs with the intent of this provision, it asks the Commission to clarify that an attempt to collect disputed charges will not give rise to a violation where the billing entity is without notice of the outstanding dispute. This exception is necessary to protect BellSouth in cases where it acts as collection agent for carriers who perform their own billing inquiry. In some instances, BellSouth would have no notice of a pending dispute unless apprised of the fact by the IXC or the end user customer. In addition, the Commission should confirm that access to pay-per-call services may be restricted or terminated based upon a customer's unreasonable refusal to pay charges incurred. In some state jurisdictions BellSouth is currently authorized to implement mandatory blocking of pay-per-call services following a second refusal to pay charges lawfully imposed.[22] BellSouth believes this to be a reasonable and necessary step to protect the revenues of carriers and pay-per-call IPs and asks that it be so held by the Commission.

Lastly, BellSouth offers these comments on three additional issues related to proposed Section 308.7. BellSouth does not report nonpayment of pay-per-call charges

[22] States permitting mandatory blocking are Florida, North Carolina, South Carolina, Alabama, Kentucky, Mississippi and Tennessee. In addition, BellSouth plans to seek like authorization in Georgia and Louisiana. See also FCC NPRM, Section 64.1512.

to credit bureaus/agencies and thus has no objection to proposed restrictions on such reporting under subsection (i). BellSouth agrees with the proposition of subsection (n) that an annual notice of billing error rights would be beneficial to customers. BellSouth would disseminate such a notice through bill inserts and offers for the Commission's review a prototype notice at Exhibit 3 to this filing.[23] In response to the Commission's request for information on record retention practices,[24] BellSouth states that service representatives update customer accounts to reflect telephone conversations and adjustment details such as bill date, carrier, amount of 900 disputed/adjusted charges and action taken. This information is routinely maintained in BellSouth's mechanized system for 90 days. Where unusual circumstances, protracted investigations or regulatory interest make it desirable, BellSouth has the further capability of retaining these records for a one (1) year period.

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[23] As detailed elsewhere in these comments, BellSouth is not in agreement with all proposed requirements for pay-per-call billing review and to that degree is unable to concur in the statement of billing rights which has been promulgated by the Commission.

[24] 58 Fed. Reg. at 13384.

CONCLUSION

BellSouth appreciates the opportunity to participate in this proceeding. BellSouth further requests that the Commission adopt rules governing the provision of pay-per-call services which are consistent with the foregoing comments.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: ______________________
William B. Barfield
Richard M. Sbaratta
Helen A. Shockey

Its Attorneys

1155 Peachtree Street, N.E.
Suite 1800
Atlanta, Georgia 30367-6000

April 9, 1993

EXHIBIT 1

DETAIL OF PAY-PER-CALL BILLING ADJUSTMENTS